

**IN THE UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF ALABAMA  
WESTERN DIVISION**

**KIMBERLY and JOHN STAPLES,** )

**Plaintiffs,** )

**v.** )

**H. WALKER ENTERPRISES, LLC;** )

**RENAISSANCE MAN FOOD** )

**SERVICES, LLC; and SIMMONS** )

**PREPARED FOODS, INC.,** )

**Defendants.** )

**Civil Action No.:**  
**7:18-cv-00160-LSC**

**DEFENDANTS' MOTION TO FILE UNDER SEAL CERTAIN PORTIONS  
OF THEIR EVIDENTIARY SUBMISSION IN RESPONSE TO  
PLAINTIFFS' MOTIONS FOR SUMMARY JUDGMENT**

Defendants H. Walker Enterprises, LLC (“HWE”) and Renaissance Man Food Services, LLC (“RMFS”), pursuant to the Agreed Protective Order entered on December 20, 2018 (Dkt. 65) and the Court’s Civil Administrative Procedures, respectfully move the Court to enter an Order allowing them to file certain portions of their Evidentiary Submission in response to Plaintiffs Motions for Summary Judgment under seal.

The aforementioned Evidentiary Submission includes the deposition exhibits of Herschel Walker, which contain confidential business and personal information.

HWE and RMFS thus seek to maintain the confidentiality of said information by requesting that said documents be sealed.

For the foregoing reasons, HWE and RMFS respectfully move the Court to enter an order allowing to file certain portions of their Evidentiary Submission in Response to Plaintiffs' Motions for Summary Judgment under seal.

This 4th day of March, 2019.

/s/ Michael J. King

Michael J. King (Pro Hac Vice)

**GREENBERG TRAURIG, LLP**

3333 Piedmont Road NE

Terminus 200, Suite 2500

Atlanta, Georgia 30305

T: (678) 553-2100

F: (678) 553 2212

kingm@gtlaw.com

**Counsel for Defendants**

**H. Walker Enterprises, LLC**

**Renaissance Man Food Services, LLC**

George Walton Walker, III (WAL097)

**THE FINLEY FIRM, P.C.**

P.O. Box 3596 (36831)

611 E Glenn Ave.

Auburn, AL 36830

T: (334) 209-6371

F: (334) 209-6373

gwwalker@thefinleyfirm.com

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## Defendants.

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## CERTIFICATE OF SERVICE

I hereby certify that a copy of the foregoing **DEFENDANTS' MOTION TO FILE UNDER SEAL CERTAIN PORTIONS OF THEIR EVIDENTIARY SUBMISSION IN RESPONSE TO PLAINTIFFS' MOTIONS FOR SUMMARY JUDGMENT** was filed by CM/ECF and served upon counsel of record by electronic notification:

Keri Donald Simms  
WEBSTER HENRY FIRM, P.C.  
Suite 445 East  
Two Perimeter Park South  
Birmingham, Alabama 35243  
Ksimms@websterhenry.com

Talley R. Parker  
JACKSON LEWIS P.C.

500 N. Akard  
Suite 2500  
Dallas, TX 75201  
talley.parker@jacksonlewis.com

Thomas A. Davis  
JACKSON LEWIS P.C.  
First Commercial Bank Building  
800 Shades Creek Parkway, Suite 870  
Birmingham, AL 35209  
DavisT@jacksonlewis.com

This 4th day of March, 2019.

/s/ Michael J. King

Michael J. King (Pro Hac Vice)  
**GREENBERG TRAURIG, LLP**  
3333 Piedmont Road NE  
Terminus 200, Suite 2500  
Atlanta, Georgia 30305  
T: (678) 553-2100  
F: (678) 553 2212  
kingm@gtlaw.com  
**Counsel for Defendants**  
**H. Walker Enterprises, LLC &**  
**Renaissance Man Food Services, LLC**

George Walton Walker, III (WAL097)  
**THE FINLEY FIRM, P.C.**  
P.O. Box 3596 (36831)  
611 E Glenn Ave.  
Auburn, AL 36830  
T: (334) 209-6371  
F: (334) 209-6373  
gwwalker@thefinleyfirm.com